423 W. EIGHTH STREET SUITE 400 KANSAS CITY, MISSOURI 64105 (816) 472-9000 • FAX (816) 472-5000 EMAIL ccke@colcom 3 LAFAYETTE CENTER, SUITE 330 1155 21ST STREET, N.W. WASHINGTON, D.C. 20036-3308 (202) 861-0740 • FAX (202) 331-9841 E-MAIL copcande@us.net

PLEASE REPLY TO THE MISSOURI OFFICE

VIA FEDERAL EXPRESS

June 11, 1997

Mr. Jose M. Rodriguez Federal Election Commission 999 E. Street, N.W. Washington, D.C. 20463

Re:

Southern Education Counsel, Inc.; MUR 3774

Dear Mr. Rodriguez:

In response to your correspondence of May 12, 1997, I am providing the following information. This information relates to calling which was conducted by Southern Education Counsel, Inc. during 1994. After an exhaustive search, my client has been able to uncover some information believed to be related to subcontracted calling done for, and with, relation to the 1994 Minnesota Senate race.

The specific entity which conducted the subcontracted activity would have been the Southern Education Counsel, Inc. The other companies/corporations listed in your correspondence are not engaged in any professional fund-raising activities. The Southern Education Counsel, Inc. is a related entity to Civic Development Group, Inc. As I previously mentioned, the Southern Education Counsel, Inc. is normally engaged in professional fund-raising activities. Such activities normally involve directly contacting consumers over the telephone and seeking financial support for charitable and other nonprofit organizations.

Southern Education Counsel, Inc. acted as a subcontractor of Optima Direct, Inc. Optima Direct, Inc. is a professional fund-raising/ direct marketing firm located at 8100 Boone Blvd., Suite 300, Vienna, VA 22182. Optima Direct is also normally engaged in the same or similar types of professional fund-raising activities as Southern Education Counsel, Inc. Either Scott Pasch or David Keezer, principals of Civic Development Group, were the ones involved in entering into the subcontract. The only other persons involved would have been individual telemarketers who simply contacted consumers either on a commission or paid-hourly basis.

There are no additional records or documents pertaining to this activity other than computer records of payments received for subcontracted work conducted by Southern Education Counsel, Inc. and/or Civic Development Group. Any work done under subcontract was simply invoiced to

Mr. Jose M. Rodriguez June 11, 1997 Page 2

Optima Direct and payments were then made directly from Optima to Civic Development. The enclosed invoices reflect the extent of the financial involvement of Southern Education Counsel, Inc.

I hope this information is helpful in the course of your investigation. Should you need anything further, please contact me. I thank you for your courtesies in this matter.

Very truly yours,

Greg B. Lam For the Firm

GBL:d Enclosures

	23083 1 964 1529 32 37		TOTALS RATE 51018 2594 4859 98 98 5β 5 6 1	00.4	\$20,407 \$1,038 \$1,944 \$39	
6 16 16 16 16 16 16 16 16 16 16 16 16 16	23083 1 964 1529 32 37 1734		0400	00.4	ARGE 11,038 11,944 \$39	
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6 16 16 16 16 16 16 16 10 10 10 10 10 10 10 10 10 10 10 10 10	16 23083 1 964 1529 32 32 1734		6400	00.04	ARGE 11,038 11,944 \$39	
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1724 1529 13 32 32 212 1734 13 17 119 1165 1105 2216	1529 32 32 1734		1 121 1	1. 1 1	\$39	
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212 1734 13 17 119 1165 1105 2216	1734			\dashv	11.7.1.1	
212 1734 13 17 119 1165 1105 2216	1734	149			0, , ,	
212 1734 13 17 119 1165 1105 2216	1734	149	_	-		
119 1165 1165 1105 2216	17		2895	0	\$0	
1105 2216		16	46	0	9	
1105 2216	1165	104	1388	0	\$0	
44000	2216	195	4216	0	9	
	30740 21476	92	67144	-		
TOTAL RECORDS 18,084 45,000 25,000	45,000	000	88084			
CUMULATIVE FILE PENETRATION 82,38222 68,31111 85,904	68.31111		76.19318			
000			010		-	
60 - Unused records 3,186 14,260 3,524	14,260	24	20,970		- 3,	
					ì	4.59cm
TOTAL IN	TOTAL	TOTAL INVOICE CHARGES	3GES	\$2	\$23,428	31.71
Page 1	Page 1					, , ,
						· ·

CIVIC DEVELOPMENT GROUP						
INVOICE#: NL201B-001						
COMPILED BY BRIAN PASCH 11/7/94						
PLEASE FOWARD TO: MATT SOTTONG						
CAMPAIGN NL201B	9	RATE	CHARGE			TOTALS
RESPONSE CODE RESULTS						
	0000		4			
11 - Good Contact (1)	37.80	0.4	&LC, L&			5314.8
12 - Good Contact - Ans Mach (2)	187	0.4	\$75	,		262.2
Refusal (685	0.4	\$274			959.4
43 - Do Not Call (4)	8	0.4	\$3			11.6
	7.67		1.87. (1)			
TOTAL CONTACTS			,			
50 - Disconnected/Bad Number (5)	124	0	\$0	-		124
52 - Deceased (6)	24	0	\$0			24
No Adult at Home	53	0	Ç,			
Dialer detect bad numbers/Misc	214	0	20			
TOTAL COMPLETES	5091					5094
TOTAL RECORDS	6,640					6640
NOTAN EL DENETONION	75 67160					78 67460
	20.000			-		601 70'07
60 - Unused records	1,549					1,549
	TOTAL INVOICE CUADORS		64 070			
	LOINE INVOICE	יייייייייייייייייייייייייייייייייייייי	0/0'14		7	

S: \$22,761	TOTAL INVOICE CHARGES:	TOT		
	108,62	10,10/	9,094	ou - Unused record / no adun contact (/)
	71.32521	67.76	75.78	CUMULATIVE FILE PENETRATION
	89978	49,957	40,021	TOTAL RECORDS
	64177	33850	30327	TOTAL COMPLETES
0\$ 0	6489	3929	2560	Dialer detect bad numbers/Misc/Ans Mach
	221	139	82	No adult at home (7)
0 \$0	6	9	က	52 - Deceased (6)
0 \$0	555	286	269	50 - Disconnected/Bad Number (5)
				TOTAL CONTACTS
2.7, 3.1.10	56,403			
0.4 \$24	61	27	34	
\$3	9553	6174	3379	
0.4 \$18,916	47289	23289	24000	11 - Good Contact (1)
CHARGE	TOTALS RATE	7	40	CAMPAIGN: GO410
			NG	PLEASE FOWARD TO: MICHELLE SOTTONG
				COMPILED BY BRIAN PASCH 11/8/94
				INVOICE#: INV410-001
			1	

CIVIC DEVELOPMENT GROUP			
INVOICE: GO410-002			
COMPILED BY BRIAN PASCH 11/7/94			
PLEASE FOWARD TO: MICHELLE SOTTONG	NG		
CAMPAIGN GO410-II	91	RATE CHARGE	TOTALS
11 - Good Contact (1)	21620	0.4 \$8 648	30268
40 - Early Hangup - Refusal (3)	5329	0.4 \$2,132	
ľ	55		77.4
	/, /, 6	70 10 10 10 10 10 10 10 10 10 10 10 10 10	
TOTAL CONTACTS			
50 - Disconnected/Bad Number (5)	3966	0\$	3966
52 - Deceased (6)	10	0\$	10
No adult at home (7)	172		
Dialer defect bad numbers/Misc/Ans Mach	5043	0 \$0	
TOTAL COMPLETES	36195		36195
		-	
TOTAL RECORDS	51,626		51626
CUMULATIVE FILE PENETRATION	70.11		70.11002
60 - Unused record / no adult contact (7)	15,431		15,431
	TOTAL INVOICE CHARGES:	 HARGES: \$10,802	
		1	

	CIVIC DEVELOPMENT GROUP				
	INVOICE#: CM530-001				
	COMPILED BY BRIAN PASCH 11/9/94				
	PLEASE FOWARD TO: MATT SOTTONG				
CAMPAIGN	CM530				TOTALS
1 1					
		CALLS	RATE CHARGE	GE	
	i	17924	L.	\$8,066	25990.25
	40 - Early Hangup - Refusal (3)	4198		\$1,889	6087.55
	43 - Do Not Call (4)	127	0.45	\$57	184.6
		12 279	10,012.05	.05	
	TOTAL CONTACTS				
	50 - Disconnected/Bad Number (5)	1124	0	\$0	1124
	52 - Deceased (6)	28	0	\$0	28
		299	0	\$0	
	Dialer detect bad numbers/Misc/Ans Mach	5730	0	\$0	
	TOTAL COMPLETES	29430			29430
	TOTAL RECORDS	40,000			40000
	CUMULATIVE FILE PENETRATION	73.58			73.575
	60 - Unused record / no adult contact (7)	10,570			10,570
		TOTAL INVOICE CHARGES	ARGES \$10,012	012	
			1	7	 1

INVOICE#:MH211-001		_		
COMPILED BY BRIAN PASCH 11/8/94				
PLEASE FOWARD TO: PHYLLIS				
C DRAD AICN MU244	7.2	a LATOT	OATE	10000
			5	מטויס
RESPONSE CODE RESULTS				
11 - Good Contact (1)	24128	33779.6	0.4	\$9,651
12 - Good Contact - Ans Mach (2)	1927	2698.2	0.4	
40 - Early Hangup - Refusal (3)	5472	7661.2	0.4	\$2,189
43 - Do Not Call (4)	92	129.2	0.4	\$37
	31,419			12, 4, 17.40
JOIAL CONTACTS				
50 - Disconnected/Bad Number (5)	2161	2161	0	\$0
52 - Deceased (6)	30	30	0	
No Adult at Home	532	532	0	\$0
Dialer Detect Bad Number/Misc	5629	5629	0	
TOTAL COMPLETES	39971	39971		
TOTAL RECORDS	53,693	53693		
CUMULATIVE FILE PENETRATION	74.4436	74.4436		
postal postal	19 700	49 700	-	
ou - Onusea records	13,722	13,722		
	101	TOTAL INVOICE CHARGES	S	\$12,648

CIVIC DEVELOPMENT GROUP						
INVOICE#: MH212-001						
COMPILED BY BRIAN PASCH 11/8/94						
PLEASE FOWARD TO: PHYLLIS						
CAMPAIGN: MH212	9	66	17	TOTALS	RATE	CHARGE
RESPONSE CODE RESULTS						
11 - Good Contact (1)	14923	53381	13273	81577	0.4	\$32,631
12 - Good Contact - Ans Mach (2)	1117	3807	2096	7020	0.4	
40 - Early Hangup - Refusal (3)	3072	11155	2734	16961	0.4	\$6,784
43 - Do Not Call (4)	23	295	18	336	0.4	\$134
				105,891		42, 357.60
TOTAL CONTACTS						
50 - Disconnected/Bad Number (5)	710	2128	787	3625		0\$
52 - Deceased (6)	35	တ္တ	2	70		\$
No Adult at Home	116	1459	369	1944	0	\$0
Dialer Detect Bad Number/Misc	1151	6024	2661	9836	0	\$0
TOTAL COMPLETES	21147	78279	21943	121369		
TOTAL RECORDS	25,000	97,500	30,000	152500		
CUMULATIVE FILE PENETRATION	84.59	80.29	73.14	79.58623		
60 - Unused records	3,853	19,221	8,057	31,131		
			<u> </u>	TOTAL INVOICE CHARGES	ARGES	\$42,358

CIVIC DEVELOPMENT GROUP		-						
IAM COLOER, MALIDAD DOA								
INVOICE#: INTELS-001								
COMPILED BY BRIAN PASCH 11/8/94								
PLEASE FOWARD TO: PHYLLIS								
CAMPAIGN: MH213	3	7	16	17	}	TOTALS R	RATE	CHARGE
RESPONSE CODE RESULTS								
44 Cond Contrast (4)	010	44400	16040	48000		00000	0	000
11 - Good Collider (1)	21040	70111	10243	10929	-	00000	2.0	\$20,400
12 - Good Contact - Aris Macri (2)	13/3	400	4644	1406		3/11	0.4	404
40 - Early Hangup - Reiusal (5)	0/3	1,45	1044	1400	-	1/00	0.4	077'7¢
43 - Do Not Call (4)	34	32	္က	25		121	0.4	\$48
					7	15,403		30, 14.1.20
TOTAL CONTACTS						,		
50 - Disconnected/Bad Number (5)	552	553	1051	362		2518	0	\$0
(52 - Deceased (6)	10	16	7	2		දිද	0	\$0
No Adult at Home	171	296	416	346		1229	. 0	\$0
Dialer Detect Bad Number/Misc	1620	1149	1834	2265		6868	0	\$0
TOTAL COMPLETES	26182	15453	22343	22079		86057		
TOTAL RECORDS	33,828	20,000	30,000	30,000		113828		
CUMULATIVE FILE PENETRATION	77.40	77.27	74.48	73.60		75.60266		
60 - Unused records	7,646	4,547	7,657	7,921		27,771		
				TOTAL INVOICE CHARGES:	CE CHAF	(GES:		\$30,161
			i		:			

				CHARGE		0.4 \$23,760	0.4 \$1,900	\$2,	0.4 \$78	12008.90	0			0 \$0					
				TOTALS RATE		59399	4750	5079	194	57.75	7941	94	367	6230	85289	28986	86.42374	13,398	i i
				66		10444	873	985	36		814	12	54	1181	14399	16,223	88.7567	1,824	
				17		16037	1400	1650	47		873	12	40	2026	22085	25,000	88.34	2,915	
				16		14180	1412	1067	54		2159	20	172	2142	21206	25,000	84.824	3,794	
				7		7867	439	772	34		3056	4	87	734	13003	16,232	80.1072	3,229	
			11	S		10871	626	605	23		1039	36	89	1328	14596	16,232	89.92114	1,636	
CIVIC DEVELOPMENT GROUP	INVOICE #NL180-001	COMPILED BY BRIAN PASCH 11/7/94	PLEASE FOWARD TO: SHANNON MCNUTT	CAMPAIGN: NL180	RESPONSE CODE RESULTS	11 - Good Contact (1)	12 - Good Contact - Ans Mach (2)	40 - Early Hangup - Refusal (3)	43 - Do Not Call (4)	TOTAL CONTACTS	50 - Disconnected/Rad Nimber (5)	52 - Deceased (6)	No Adult at Home	Dialer Detect Bad Number/Misc	TOTAL COMPLETES	TOTAL RECORDS	CUMULATIVE FILE PENETRATION	60 - Unused records	

CIVIC DEVELOPMENT GROUP								
INVOICE#: NL181-001								
COMPILED BY BRIAN PASCH 11/8/94								
PLEASE FOWARD TO: SHANNON MACNUT	NUTT							
CAMPAIGN: NL181	16	9	66	17	2	TOTALS RA	RATE	CHARGE
RESPONSE CODE RESULTS								
11 - Good Contact (1)	24911	14587	25016	3487		68001	0.4	\$27,200
12 - Good Contact - Ans Mach (2)	1919	1445	1824	267	-	5455	0.4	\$2,182
40 - Early Hangup - Refusal (3)	2038	1839	3972	403		8252	0.4	\$3,301
43 - Do Not Call (4)	58	86	06	5		251	0.4	\$100
					81	959		37. 733.00
TOTAL CONTACTS								
50 - Disconnected/Bad Number (5)	1521	808	1052	104	-	3485	0	\$0
52 - Deceased (6)	44	25	16	m		88	0	\$0
No Adult at Home	862	157	86	76	-	1105	0	\$0
Dialer Detect Bad Number/Misc	1215	1064	1417	181		3696	0	O\$
TOTAL COMPLETES	32568	20023	33473	4526		08906		
TOTAL RECORDS	32,568	25,000	40,739	8,432		106739		
CUMULATIVE FILE PENETRATION	100	80.092	82.16	53.68	8	84.87057		
60 - Unused records	0	4,977	7,266	3,906		16,149		
				TOTAL INVOICE CHARGES:	E CHAR	GES:		\$32,784

	1							
MVOICE#: All 182 001								
HAVOIDEM: NEIDE-500								
COMPILED BY BRIAN PASCH 11/8/94								
PLEASE FOWARD TO: SHANNON MACNUTH	NUTT							
NL182	16	φ	11	5	7	TOTALS	RATE	CHARGE
DECEDONICE CODE DECILITS								
מומר מספר וידיסייי								
11 - Good Contact (1)	19677	11560	21274	16726	13945	83182	32 0.4	\$33,273
12 - Good Contact - Ans Mach (2)	2532	919	1761	647	591	6450	50 0.4	\$2,580
40 - Early Hangup - Refusal (3)	1250	1108	2000	327	2494	7179	79 0.4	\$2,872
43 - Do Not Call (4)	26	34	99	15	26	16	167 0.4	\$67
						94,708		58711.00
TOTAL CONTACTS								
50 - Disconnected/Bad Number (5)	3233	1190	1730	1193	1928	9274		Ç
(52 - Deceased (6)	26	33	13	3			0 62	80
No Adult at Home	440	12	49	11	21	96		30
Dialer Detect Bad Number/Misc	3159	1607	3098	1919	1942	7864	34 0	\$0
TOTAL COMPLETES	30343	16463	29991	20841	20951	118589	68	
TOTAL RECORDS	40,000	20,000	40,000	23,989	25,000	148989	36	
CUMULATIVE FILE PENETRATION	75.8575	82.315	74.98	86.88	83.80	79.59581	31	
60 - Unused records	9,657	3,537	10,009	3,148	4,049	30,400	00	
					TOTAL INVOICE CHARGES:	ים כחץ מטענטי		\$38 794



CIVIC DEVE PMENT GROUP, INC. 655 Florida Grove Road Suite 203, Second Floor Hopelawn, NJ 08861

INVOICE

UNIT PRICE

INVOICE NO: 95-001 DATE: January 18, 1995

AMOUNT

Phone #: 908-634-1411 Fax #: 908-634-6106

To:

Optima Direct

QUANTITY

Attn: Accounts Payable

SALESPERSON	P.O. NUMBER	DATE SHIPPED	SHIPPED VIA	F.O.B. POINT	TERMS

DESCRIPTION

	63,245	Campaign NL201A, Campaign NL201B	\$	0.40	\$25,298.00	
	83,907	Campaign G0410, CampaignG0410-II	\$	0.40	\$33,562.80	
	22,249	Campaign CM530	\$	0.45	\$10,012.05	
	137,513	Campaign MH211, Campaign MH212	\$	0.40	\$55,005.20	
	75,403	Campaign MH213	\$	0.40	\$30,161.20	
	151,381	Campaign NL180, Campaign NL181	\$	0.40	\$60,552.40	
	96,978	Campaign NL182	\$	0.40	\$38,791.20	
SUBTOTAL				OTAL	\$253,382.85	
Less Amount paid				aid	243,372.00	Į
TOTAL DUE			. DUE	\$10,010.85	i	

Make all checks payable to: Civic Development Group, Inc. If you have any questions concerning this invoice, call: Treisa Flanagan, (908) 634-1411

THANK YOU FOR YOUR BUSINESS!